

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION**

Emily Doe,

Plaintiff,

vs.

American University of Antigua Inc.,

Defendant.

C.A. No. 4:20-cv-04445-JD

**DEFENDANT’S MOTION TO DISMISS
PLAINTIFF’S COMPLAINT**

Defendant American University of Antigua Inc. (“Defendant”), by and through undersigned counsel, respectfully moves for an Order dismissing Plaintiff Emily Doe’s (“Plaintiff”) Complaint (Dkt No. 1) for lack of personal jurisdiction and on *forum non conveniens* grounds, pursuant to Federal Rules of Civil Procedure 12(b)(2) and (3).

Defendant submits the accompanying Memorandum of Law in support of its Motion. Defendant respectfully requests that the Court dismiss all of Plaintiff’s claims without the opportunity to amend.

[Signature Page to Follow]

Respectfully submitted,

/s/ Angus H. Macaulay

Angus H. Macaulay, Fed. ID No. 5248

Brittany N. Clark, Fed. ID No.

AMacaulay@nexsenpruet.com

BCClark@nexsenpruet.com

NEXSEN PRUET, LLC

1230 Main Street, Suite 700 (29201)

Post Office Drawer 2426

Columbia, SC 29202

PHONE: 803.771.8900

FACSIMILE: 803.727.1435

*Attorneys for Defendant American
University of Antigua Inc.*

February 22, 2021
Columbia, South Carolina